

Ozone Working Group – May 20, 2004

Meeting Notes

These notes summarize public comments and discussion at the May 20, 2004 Ozone Working Group meeting.

Follow-up from May 20, 2004 OWG meeting

- Commenter continues to believe that meeting notes are too brief. Commenter believes that the main product of the meeting is the notes, and that detail is not reflected. Response: Staff believes the meeting notes provide accurate summaries of discussion at meetings, and asks commenter to identify areas where notes are incorrect or omit important details.

Status Reports

- Question whether exceedance of 8-hr standard may be an anomaly, i.e., not necessarily a recurring problem. Response: Interpreting monitoring data is complex, but EPA is confident with the monitoring data provided by the District. In addition, apart from national requirements, State law requires the region to attain the State standard and reduce transport.
- Explain difference between 1-hour standard and 8-hr standard. Are measures needed region-wide even if exceedance is recorded at particular locations. Response: The 1-hour standard focuses on ozone levels over a one-hour period, while the 8-hour standard limits ozone levels averaged over an eight-hour period. For this reason, the 8-hour standard is considered more health-protective. Ozone is a regional pollutant, and so emission reductions are needed throughout the region to attain the standard at all monitoring locations.
- Interested in the EIR. Which areas were identified as significant? Response: The EIR is still being prepared. Potentially adverse impacts haven't been identified yet. The Draft EIR will be available for public review along with the Ozone Strategy later this year.
- Did NOP comments affect how the District is approaching the EIR? Have alternatives been selected? Response: All NOP comments have been forwarded to the CEQA consultants and will be addressed in the EIR. Project alternatives have not yet been identified.

- How is the District dealing with TCM target for State standard in regard to Health & Safety Code Section 40233. Has the District provided a target to MTC? Response: The District is not required to provide a TCM emission reduction target to MTC, and has not done so. However, all of the TCMs are being reviewed and revised by MTC and the District.
- What is the District's fallback in case of exceedances this summer? Response: If 1-hour exceedances occur this summer, the District and EPA will work closely together to determine how to respond.
- Will any Federal measures (SIP measures) be included in the plan? Commenter believes that the plan should include contingency measures, e.g., refinery measures, for the national 1-hour standard. Response: The rule development process for several refinery measures is moving forward. The maintenance plan will include contingency provisions.
- Will the Ozone Strategy address (State) triennial update requirements? Response: Yes.

Draft Control Measures

- What agency has the authority to mandate the TCM's? Response: TCMs are not mandated. Numerous agencies are involved in implementing TCMs.
- Commenter recommends against the use of biodiesel as alternative fuel since it can increase NOx emissions. Would recommend other alternative fuels (e.g., water-emulsified fuel). Response: District is aware of this and is currently conducting research on relationship of biodiesel use and NOx.
- Would like clarification on "all feasible measures" and link to Control Measures and Further Study Measures. Response: State law requires the District to adopt all feasible measures to attain the State standard and reduce transport. The draft control measures reflect our determination of all feasible measures. Further study measures are measures that need further analysis to determine whether they are viable.
- Since the mobile source measures are voluntary, is there expectation that they will be broadly adopted? Response: Difficult to predict. The District

will continue to implement grant programs and will actively encourage adoption of the model ordinances.

- Does the recent South Coast ruling affect ability to include mobile source measures? Response: No, because the proposed measures are voluntary.
- Definition of “feasible measures” depends on the perceived need. Commenter believes Ozone Strategy should set targets, especially for transport, since feasibility is not a fixed thing.
- Diesel PM is a big issue. Commenter believes the mobile source measures should be expanded. District CEQA guidelines should encourage use of non-diesel off-road equipment and other diesel PM mitigation ideas. Should identify use of diesel as significant impact in guidelines unless best-available control technologies are in place. Response: District is working to include additional discussion of diesel PM and mitigation in CEQA guidelines. District will provide guidance on significant impacts and mitigation measures.
- Regarding MS-3, Low Emission Vehicle Incentives, commenter concerned about the disposal of older polluting buses. Should be commitment that older engines aren’t reused by another entity. Also concerned that MS-3 could result in cost inefficient purchases of entire vehicles rather than retrofits. Suggest looking into South Coast bus crushing program as means of ensuring polluting vehicles do not remain in use.
- Suggest agreement with cities to limit use of polluting equipment on Spare the Air days. Cities could curtail contractor’s work. Response: District has such program underway and proposes to expand it.
- Commenter suggests TCM calculations that assume higher gas prices (e.g., \$4/gallon). Response: Gas prices are very inelastic. TCM 18 looks at impacts of various fuel taxes.
- TCM #1 seems to relate to several other TCM’s. Commenter will provide suggestions for organizing TCM’s such that this is clear.
- Some previous comments in OWG do not seem to be reflected. WTA encourages District to look at studies of emulsified fuels and integrate into biodiesel measure.

- Do short-term measures, e.g., Spare the Air, help meet 8-hr standard as well as 1-hr standard? Response: Yes.
- Article regarding livestock waste methane electric power production may contain useful information for the District.
- Is Spare the Air currently a voluntary program? Suggests a specific rule on STA rather than reference to STA in all other measures.

NEXT MEETING: July 27 9:30-11:30 MetroCenter (here)